

REMARKS

Claims 1-7, 9, 11-15, 17, 19, 21-24, 26-40, and 44-47 are pending.

Claims 1-7, 9, 11-15, 17, 19, 21-24, 26-40, and 44-47 stand rejected.

Claim 9 is currently amended.

Claims 48 and 49 have been added.

NOTE: Applicant indicated in the November 19, 2003 RCE submission that Applicant had paid for 45 claims. Applicant submits now that only 44 total claims have been paid for. However, the incorrect recitation of the total number of claims had no impact on calculation of any fees due. Accordingly, the error was harmless.

Specification

The specification is objected to as failing to support “*uniform* resource locator” in claim 9. Claim 9 has been amended to recite “universal resource locator”, which is supported by the specification in p. 1, lns. 14-20.

Claim Rejections - 35 U.S.C. § 103

Claims 1-7, 9, 11-13, 17, 19, 21-24, 26-31, 33, 36-40, and 44-47 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,038,601 issued to Lambert (hereinafter “*Lambert*”) in view of U.S. Patent No. 6,185,608 issued to Hon et al. (hereinafter “*Hon*”). Applicant respectfully traverses the rejection.

As discussed in more detail, Applicant respectfully submits that *Lambert* in combination with *Hon* neither teaches nor suggests the present invention of independent claims 29, 45, and 46 and the rejected claims that depend (directly or indirectly) thereon.

As stated in Applicant's November 19, 2003 RCE submission, Applicants respectfully submit that the *arguably* relevant teachings and suggestions of *Lambert* relate to caching of static web pages and contain no teachings or suggestions relating to "a dynamic content caching and retrieval system" as recited by claim 45, "a method of caching and retrieving cached dynamically generated files" as recited by claim 29, or "a dynamic content caching and retrieval system" as recited by claim 46. (emphasis added). The Examiner admits that "*Lambert* does not explicitly disclose *dynamically* generated files as being cached." Office Action, p. 4.

Claim 45

In paragraph 4 of the Office Action, the Examiner rejects claim 45 in part by stating that:

generated electronic files stored in a storage medium, each generated electronic file included an identifier **that is derived from** generated presentation information stored in the file (e.g. the ICEXPIRE tag included in the file)(at least col. 12, lines 38-60; col. 13, lines 30-45) (emphasis added).

The 'bold' portion of the quote above is not contained in claim 45. Claim 45 recites:

dynamically generated electronic files stored in a storage medium, each dynamically generated electronic file includes an identifier that identifies dynamically generated presentation information stored in the file.

Nevertheless, similar language is recited in claims 29 and 46 and is addressed below.

Also, for purposes of completeness the ICEXPIRE tag will also be addressed in relation to claim 45.

Lambert includes teachings regarding mechanisms used for file expiration control such as the ICEXPIRE tag. The ICEXPIRE tag is included as meta-data in a stored file to indicate an expiration data of the file. The ICEXPIRE tag specifically relates to "meta-data expiration control automatic expiration control." *Lambert*, col. 12, lns. 66-67. Claim 45 states that "each dynamically generated electronic file includes an identifier that identifies dynamically generated

presentation information stored in the file.” The ICEXPiRE tag does not identify “generated presentation information stored in the file” as required by claim 45. The ICEXPiRE tag does not “identify” any information. In contrast, the ICEXPiRE tag is meta-data that simply indicates when the file expires. Applicant respectfully submits that the expiration of a file is derived from a determination of the life-time of the information not from “presentation information stored in the file.” Claim 45.

Claim 45 also recites:

a computer readable representation received by the system from a client computer system, the computer readable representation having a presentation state signature based on a presentation state defined, at least in part, by one or more parameters selected by a user interacting with a file displayed by the client computer system, wherein the computer readable representation is useful to identify one of the dynamically generated electronic files in which stored presentation information is associated with the presentation state upon which the signature is based.

The Examiner states that *Lambert* teaches the above portion of claim 45 in at least col. 15, lines 34-40, 59-66 and appears to equate the above portion of claim 45 with a “URL link selected by the client for the new page.” Office action, para. 4.

Lambert, col. 15, lines 34-40 and 59-66 recite:

According to one embodiment, lookahead caching uses predictive algorithms to determine where a user may go given their current location. Lookahead caching then attempts to fetch the desired content before the user actually travels to the new location. Thus, when the user actually travels along a web link to a new page, that page is already present locally and can be displayed very quickly. ...

Whenever the user requests a page from their web browser, that page is looked ahead upon. That user-requested page is known as the "initial page".

Child page

A page reachable via URL from a "parent page". The lookahead algorithm works by analyzing child links of the initial page, and then recursing on the pages pointed to by each child link.

Lambert is, thus, teaching how to fetch a page “ before the user actually travels to the new location.” The look-ahead algorithm analyzes “child pages” referenced in parent pages, and child pages are pages who are reachable via a URL from a “parent page”. *Lambert* contains no suggestion of a “a computer readable representation received by the system from a client computer system, computer readable representation having a presentation state signature based on a presentation state defined, at least in part, by one or more parameters selected by a user interacting with a file displayed by the client computer system.” Claim 45. Furthermore, *Lambert* contains no suggestion that the URL received from the requested “initial page” contains a “presentation state signature ... defined, at least in part, by one or more parameters selected by a user interacting with a file.” Claim 45. The URL of *Lambert* is simply a URL to a page. The fact that the URL may reference a page that includes “child links” has no bearing on the contents of the parent URL itself. And, even if it did, the parent URL does not include “a “presentation state signature ... defined, at least in part, by one or more parameters selected by a user interacting with a file” as required by claim 45 (emphasis added).

Hon teaches that a:

system consists of data storage connected to the server, a converter program in the server for transforming data from the data storage into transmissible form, such as HTML, for display on the client machine, a cache on the server for storing one or more copies of the transformed data in transmissible form, and means in the server for checking the cache for a copy of the transformed data in transmissible form before activating the converter program on receiving a request for data transmission from the client. *Hon*, col. 3, lns. 23-33.

Hon also teaches that:

there are two command URLs to display category pages and product pages respectively. The former is ;display/category and the latter is ;display/item. The category command takes two parameters, one is the category reference number and another is the merchant reference number. Similarly, the product command takes two parameters, one is the product reference number and another is the

merchant reference number. A reference number in Net.Commerce is a primary key in a database table. A category reference number uniquely qualifies which category to display, and a product reference number for which product to display. *Id.*, col. 4, lns. 23-34.

Hon further teaches that:

File names created in the cache will typically look like this:

cgmenbr1_cgrfnbr5_ncibm

prmenbr1_prrfnbr8_ncibm

These files would be created by caching the results of the commands

;display/category?cgmenbr=1&cgrfnbr=5 and

;display/item?prmenbr=1&prrfnbr=8, respectively.

In the above examples, "5" is the value of the category reference number (cgrfnbr) in the first command and "8" is the value of the product reference number (prrfnbr) in the second. In both cases, the merchant reference number is "1". *Hon*, col. 4, lns. 51-63.

Hon also teaches the addition of a "significance", which is an additional parameter that affects the file names of the cached files. *Hon* states that example "significance" is distribution of shopper groups with Gold, Silver, and Platinum levels. *Id.*, col. 5, lns. 16-39. Thus, *Hon* teaches file names that correspond to particular merchants, categories, products, and "significances". Accordingly, *Hon* fails to teach or suggest "computer readable representation having a presentation state signature based on a presentation state defined, at least in part, by one or more parameters selected by a user interacting with a file" as required by claim 45.

Thus, even assuming, without admitting, that the motivation to combine *Lambert* and *Hon* exists, the combination of *Lambert* and *Hon* teaches that a URL returned by a user can identify a dynamically generated, cached page using a specific set of parameters that identify a merchant, a category or product, and a "significance" parameter, such as a shopper group. The reference number used to identify the category or product refers to a primary key in a database table.

Thus, neither *Lambert* nor *Hon*, alone or in combination, teach or suggest:

a computer readable representation received by the system from a client computer system, the computer readable representation having a presentation state signature based on a presentation state defined, at least in part, by one or more parameters selected by a user interacting with a file displayed by the client computer system, wherein the computer readable representation is useful to identify one of the dynamically generated electronic files in which stored presentation information is associated with the presentation state upon which the signature is based. Claim 45. (emphasis added).

Since neither *Lambert* nor *Hon*, alone or in combination, teach or suggest a presentation state signature as recited by claim 45, neither *Lambert* nor *Hon* can teach:

a routine executable by the processor to determine if the presentation state signature of the computer readable representation identifies one of the dynamically generated electronic files stored in the memory of the system. Claim 45.

Claim 29.

Applicants also respectfully submit that although *Lambert* teaches including meta-file data in a file that identifies expiration of the file and *Hon* teaches file names that correspond to particular merchants, categories, products, and “significances”, neither *Lambert* nor *Hon* teach or suggest “each dynamically generated file is associated with a file identifier that is derived from state information that describes contents of the associated dynamically generated electronic file” as required by claim 29. The ICEXPIRE tag ‘describes’ the expiration of a file. The expiration of a file is not “derived from state information that describes contents of the associated dynamically generated electronic file” as required by claim 29. Applicant respectfully submits that the expiration of a file is derived from a determination of the life-time of the information not from “state information that describes contents” of a file. Furthermore, the identification of a file by particular merchants, categories, products, and “significances” as described by *Hon* also is not “derived from state information that describes contents of the associated dynamically generated

electronic file” as required by claim 29. Thus, the combination of *Lambert* and *Hon* fails to teach or suggest claim 29.

Furthermore, *Lambert* and *Hon*, alone or in combination, fail to teach, for example, “receiving a file request that includes state information based on selections of a user interacting with a web page using at least one client computer system” as required by claim 29. *Lambert* only discloses the use of standard URLs to identify a ‘parent page’. As discussed above, although *Lambert* discloses use of a look-ahead algorithm to analyze “child pages” referenced in parent pages. Child pages are pages who are reachable via a URL from a “parent page”. The fact that the URL may reference a page that includes “child links” has no bearing on the contents of the parent URL itself. And, even if it did, the parent URL does not include “a file request that includes state information based on selections of a user interacting with a web page” as required by claim 29 (emphasis added). Additionally, the file request of *Hon* also does not include “state information based on selections of a user interacting with a web page” as required by claim 29. Thus, the combination of *Lambert* and *Hon* cannot teach or suggest the present invention of claim 29.

Claim 46.

For at least the reasons discussed with regard to claim 29, neither *Lambert* nor *Hon*, alone or in combination, teach or suggest:

means for caching the dynamically generated electronic files and associating a respective file identifier with each of the dynamically generated electronic files, wherein each file identifier is derived from state information that describes contents of the associated dynamically generated electronic file;

means for receiving a file request that includes state information based on selections of a user interacting with a web page using at least one client computer system. Claim 45.

For at least the above stated reasons, Applicants respectfully submit that independent claims 29, 45, and 46 are allowable. Applicants also respectfully submit that the dependent claims are allowable for at least the same reasons as the independent claim upon which each directly or indirectly depends.

Withdrawal of the rejection is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claims 34-35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,038,601 issued to Lambert et al. in view of U.S. Patent No. 6,006,264 issued to Colby et al. (hereinafter “*Colby*”). The rejection is respectfully traversed.

Colby generally relates to a “Method and system for directing a flow between a client and a server.” *Colby* title. *Colby* teaches “that an HTTP 404 error in response to a request for the requested content” indicates that a server “no longer contains the requested content”. *Colby* col. 12, lns. 6-13. Applicant respectfully submits that *Colby* does not add any relevant teachings to *Lambert* with reference to the allowability of claim 29. Thus, Applicant respectfully submits that claims 34-35, which depend upon independent claim 29, are allowable for at least the same reasons as those discussed above with reference to claim 29.

Withdrawal of the rejection is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claims 14, 15, and 32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,038,601 issued to Lambert et al. in view of U.S. Patent No. 6,289,358 issued to Mattis et al. (hereinafter “*Mattis*”). The rejection is respectfully traversed.

Mattis relates to “a method [] for caching and delivering an alternate version from among a plurality of alternate versions of information objects.” *Mattis*, Abstract. “In the cache, a vector

of alternates is associated with a key value that identifies the information object.” *Id.* “The vector of alternates stores information that describes the alternate, the context and constraints of the object's use, and a reference to the location of the alternate's object content.” *Id.* Applicant respectfully submits that *Mattis* does not add any relevant teachings to *Lambert* with reference to the allowability of claims 29 and 45. Thus, Applicant respectfully submits that claims 14 and 15, which depend upon independent claim 45, and claim 32, which depends upon independent claim 29, are allowable for at least the same reasons as those discussed above with reference to claims 29 and 45.

Withdrawal of the rejection is respectfully requested.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Fee Amendment, Commissioner for Patents, PO Box 1450, Alexandria, VA 22313-1450, on August 16, 2004.



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Date of Signature

Respectfully submitted,



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